

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

DYNAMIC HOSTING COMPANY LLC,

Plaintiff,

v.

(1) HEWLETT-PACKARD COMPANY;
AND
(2) HP ENTERPRISE SERVICES, LLC,

Defendants.

CIVIL ACTION NO. 2:14-cv-1074

ORIGINAL COMPLAINT
FOR PATENT INFRINGEMENT

JURY TRIAL DEMANDED

Plaintiff Dynamic Hosting Company LLC (“Dynamic Hosting”) files this original complaint against the above-named defendants, alleging, based on its own knowledge as to itself and its own actions, and based on information and belief as to all other matters, as follows:

PARTIES

1. Dynamic Hosting is a limited liability company formed under the laws of the State of Texas, with a principal place of business in Tyler, Texas.

2. Defendant Hewlett-Packard Company (“HP Co.”) is a corporation organized under the laws of Delaware with a principal place of business in Palo Alto, CA. It can be served through its resident agent for service of process in Texas: CT Corporation System; 1999 Bryan St., Ste. 900, Dallas, TX 75201-3136.

3. Defendant HP Enterprise Services, LLC (“HP Enterprise Services”) is a limited liability company organized under the laws of Delaware with a principal place of business in Plano, TX. It can be served through its resident agent for service of process in Texas: CT Corporation System; 1999 Bryan St., Ste. 900, Dallas, TX 75201-3136.

4. Upon information and belief, HP Enterprise Services assists businesses with setting up IT networks and related services, such as HP ePrint Enterprise.

See http://www8.hp.com/us/en/solutions/business-solutions/printingsolutions/ePrint_Enterprise.html.

5. HP Enterprise Services is a subsidiary of HP Co., and the companies will collectively be referred to as “HP.”

JURISDICTION AND VENUE

6. This is an action for infringement of a United States patent arising under 35 U.S.C. §§ 271, 281, and 284–85, among others. This Court has subject matter jurisdiction of the action under 28 U.S.C. § 1331 and § 1338(a).

7. Venue is proper in this district under 28 U.S.C. §§ 1391 and 1400(b). Upon information and belief, defendants have transacted business in this district and have committed acts of patent infringement in this district.

8. Defendants are subject to this Court’s specific and general personal jurisdiction under due process and/or the Texas Long Arm Statute due at least to defendants’ substantial business in this forum, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct, and/or deriving substantial revenue from goods and services provided to individuals in Texas and in this district.

KNOWLEDGE

9. This lawsuit involves, as will be further described below, infringement of U.S. Patent Nos. 5,826,026 and 6,216,156.

10. Defendant has or will have knowledge of the patents-in-suit at least of the filing date and/or service date of this complaint.

11. Defendant's infringement is willful at least as of the filing date and/or service date of this complaint.

COUNT I: INFRINGEMENT OF U.S. PATENT NO. 5,826,026

12. On Oct. 20, 1998, United States Patent No. 5,826,026 ("the 026 patent") was duly and legally issued by the United States Patent and Trademark Office for an invention titled "Internet Message Communicator With Direct Output To A Hard Copy Device."

13. Dynamic Hosting is the owner of the 026 patent with all substantive rights in and to that patent, including the sole and exclusive right to prosecute this action and enforce the 026 patent against infringers, and to collect damages for all relevant times.

14. HP made, had made, used, imported, provided, supplied, distributed, sold, and/or offered for sale printers that implemented Google Cloud Print (including, based on information on its or Google's website(s), at least the following models: HP Color LaserJet Enterprise CM4540 MFP Series, HP Color LaserJet Enterprise CP5525 Printer Series, HP LaserJet Enterprise M4555 MFP Series, HP HotSpot LaserJet Pro M1218nfs MFP Series, HP LaserJet Pro 100 Color MFP M175nw, HP LaserJet Pro 200 Color M251 Series, HP LaserJet Pro 200 Color M276 Series, HP LaserJet Pro 400 Color M401 Series, HP LaserJet Pro 400 Color M425 Series, HP LaserJet Pro 400 Color M451 Series, HP LaserJet Pro 400 Color M475 Series, HP LaserJet Pro CM1415 Color Multifunction Printer Series, HP LaserJet Pro CP1025nw Color Printer, HP LaserJet Pro CP1525 Color Printer Series, HP LaserJet Pro M177fw Multifunction Printer, HP LaserJet Pro M1210 Multifunction Printer Series, HP LaserJet Pro M1536 Multifunction Printer Series, HP LaserJet Pro MFP M125nw Printer, HP LaserJet Pro MFP

M127fn Printer, HP LaserJet Pro MFP M127fw Printer, HP LaserJet Pro MFP M201dw Printer, HP LaserJet Pro MFP M201n Printer, HP LaserJet Pro MFP M202dw Printer, HP LaserJet Pro MFP M202n Printer, HP LaserJet Pro MFP M225dw Printer, HP LaserJet Pro MFP M225dn Printer, HP LaserJet Pro MFP M226dw Printer, HP LaserJet Pro MFP M226dn Printer, HP LaserJet Pro P1102w Printer, HP LaserJet Pro P1606dn Printer, HP TopShot LaserJet Pro M275 MFP, HP Deskjet 3050A e-All-in-One Printer Series (J611), HP Deskjet 3070A e-All-in-One Printer Series (B611), HP Deskjet 3510 e-All-in-One Printer Series, HP Deskjet 3520 e-All-in-One Printer Series, HP Deskjet Ink Advantage 3515 e-All-in-One Printer Series, HP Deskjet Ink Advantage 3520 e-All-in-One Printer Series, HP Deskjet Ink Advantage 3540 e-All-in-One Printer Series, HP Deskjet Ink Advantage 4510 e-All-in-One Printer Series, HP Deskjet Ink Advantage 4620 e-All-in-One Printer Series, HP Deskjet Ink Advantage 4640 e-All-in-One Printer Series, HP Deskjet Ink Advantage 5520 e-All-in-One Printer Series, HP Deskjet Ink Advantage 6520 e-All-in-One, HP Designjet T120 24-in ePrinter, HP Designjet T520 24-in ePrinter, HP Designjet T520 36-in ePrinter, HP Designjet T790 24-in ePrinter, HP Designjet T790 24-in PostScript ePrinter, HP Designjet T790 44-in ePrinter, HP Designjet T790 44-in PostScript ePrinter, HP Designjet T1300 44-in ePrinter, HP Designjet T1300 44-in PostScript ePrinter, HP Designjet T2300 eMultifunction Printer, HP Designjet T2300 Postscript eMultifunction Printer, HP ENVY 100 e-All-in-One Printer Series (D410), HP ENVY 110 e-All-in-One Printer Series (D411), HP ENVY 120 e-All-in-One Printer Series, HP ENVY 4500 e-All-in-One Printer Series, HP ENVY 5530 e-All-in-One Printer Series, HP ENVY 5640 e-All-in-One Printer Series, HP ENVY 5660 e-All-in-One Printer Series, HP ENVY 7640 e-All-in-One Printer Series, HP Officejet 4620 e-All-in-One Printer Series, HP Officejet 4630 e-All-in-One Printer Series, HP Officejet 5740 e-All-in-One Printer Series, HP Officejet 6100 ePrinter Series

(H611), HP Officejet 6500A e-All-in-One Printer Series (E710), HP Officejet 6600 All-in-One Printer Series, HP Officejet 6700 Premium All-in-One Printer Series, HP Officejet 6810 e-All-in-One Printer Series, HP Officejet 7500A Wide Format e-All-in-One Printer Series (E910), HP Officejet 7610 Wide Format e-All-in-One Printer Series (H912), HP Officejet 8040 e-All-in-One Printer Series, HP Officejet Pro 251dw Printer Series, HP Officejet Pro 276dw Multifunction Printer Series, HP Officejet Pro 6230 ePrinter Series, HP Officejet Pro 6830 e-All-in-One Printer Series, HP Officejet Pro 8100 ePrinter Series (N811), HP Officejet Pro 8500A e-All-in-One Printer Series (A910) , HP Officejet Pro 8600 e-All-in-One Printer Series (N911), HP Officejet Pro 8610 e-All-in-One Printer Series, HP Officejet Pro 8620 e-All-in-One Printer Series, HP Officejet Pro 8630 e-All-in-One Printer Series, HP Officejet Pro 8640 e-All-in-One Printer Series, HP Officejet Pro 8660 e-All-in-One Printer Series, HP Officejet Pro X451 All-in-One Printer Series, HP Officejet Pro X476 Multifunction Printer Series, HP Officejet Pro X551 Printer Series, HP Officejet Pro X576 Multifunction Printer Series, HP Photosmart 5510 e-All-in-One Printer Series (B111), HP Photosmart 5520 e-All-in-One Printer Series, HP Photosmart 6510 e-All-in-One Printer (B211), HP Photosmart 6520 e-All-in-One Printer Series, HP Photosmart 7510 e-All-in-One Printer Series (C311), HP Photosmart 7520 e-All-in-One Printer Series, HP Photosmart e-All-in-One Printer Series (D110), HP Photosmart eStation e-All-in-One Printer Series (C510), HP Photosmart Ink Advantage e-All-in-One Printer Series (K510), HP Photosmart Plus e-All-in-One Printer Series (B210), HP Photosmart Premium e-All-in-One Printer Series (C310), HP Photosmart Premium Fax e-All-in-One Printer Series (C410), HP Photosmart Wireless e-All-in-One Printer Series (B110)) that directly infringed one or more claims of the 026 patent.

15. HP made, had made, used, imported, provided, supplied, distributed, sold, and/or offered for sale printers that are compatible with the feature designated “HP ePrint” (including, based on information on its website(s), at least the following models: HP Color LaserJet Enterprise CM4540 MFP Series, HP Color LaserJet Enterprise CP5525 Printer Series, HP LaserJet Enterprise M4555 MFP Series, HP HotSpot LaserJet Pro M1218nfs MFP Series, HP LaserJet Pro 100 Color MFP M175nw, HP LaserJet Pro 200 Color M251 Series, HP LaserJet Pro 200 Color M276 Series, HP LaserJet Pro 400 Color M401 Series, HP LaserJet Pro 400 Color M425 Series, HP LaserJet Pro 400 Color M451 Series, HP LaserJet Pro 400 Color M475 Series, HP LaserJet Pro CM1415 Color Multifunction Printer Series, HP LaserJet Pro CP1025nw Color Printer, HP LaserJet Pro CP1525 Color Printer Series, HP LaserJet Pro M177fw Multifunction Printer, HP LaserJet Pro M1210 Multifunction Printer Series, HP LaserJet Pro M1536 Multifunction Printer Series, HP LaserJet Pro MFP M125nw Printer, HP LaserJet Pro MFP M127fn Printer, HP LaserJet Pro MFP M127fw Printer, HP LaserJet Pro MFP M201dw Printer, HP LaserJet Pro MFP M201n Printer, HP LaserJet Pro MFP M202dw Printer, HP LaserJet Pro MFP M202n Printer, HP LaserJet Pro MFP M225dw Printer, HP LaserJet Pro MFP M225dn Printer, HP LaserJet Pro MFP M226dw Printer, HP LaserJet Pro MFP M226dn Printer, HP LaserJet Pro P1102w Printer, HP LaserJet Pro P1606dn Printer, HP TopShot LaserJet Pro M275 MFP, HP Deskjet 3050A e-All-in-One Printer Series (J611), HP Deskjet 3070A e-All-in-One Printer Series (B611), HP Deskjet 3510 e-All-in-One Printer Series, HP Deskjet 3520 e-All-in-One Printer Series, HP Deskjet Ink Advantage 3515 e-All-in-One Printer Series, HP Deskjet Ink Advantage 3520 e-All-in-One Printer Series, HP Deskjet Ink Advantage 3540 e-All-in-One Printer Series, HP Deskjet Ink Advantage 4510 e-All-in-One Printer Series, HP Deskjet Ink Advantage 4620 e-All-in-One Printer Series, HP Deskjet Ink Advantage 4640 e-All-in-One

Printer Series, HP Deskjet Ink Advantage 5520 e-All-in-One Printer Series, HP Deskjet Ink Advantage 6520 e-All-in-One, HP Designjet T120 24-in ePrinter, HP Designjet T520 24-in ePrinter, HP Designjet T520 36-in ePrinter, HP Designjet T790 24-in ePrinter, HP Designjet T790 24-in PostScript ePrinter, HP Designjet T790 44-in ePrinter, HP Designjet T790 44-in PostScript ePrinter, HP Designjet T1300 44-in ePrinter, HP Designjet T1300 44-in PostScript ePrinter, HP Designjet T2300 eMultifunction Printer, HP Designjet T2300 Postscript eMultifunction Printer, HP ENVY 100 e-All-in-One Printer Series (D410), HP ENVY 110 e-All-in-One Printer Series (D411), HP ENVY 120 e-All-in-One Printer Series, HP ENVY 4500 e-All-in-One Printer Series, HP ENVY 5530 e-All-in-One Printer Series, HP ENVY 5640 e-All-in-One Printer Series, HP ENVY 5660 e-All-in-One Printer Series, HP ENVY 7640 e-All-in-One Printer Series, HP Officejet 4620 e-All-in-One Printer Series, HP Officejet 4630 e-All-in-One Printer Series, HP Officejet 5740 e-All-in-One Printer Series, HP Officejet 6100 ePrinter Series (H611), HP Officejet 6500A e-All-in-One Printer Series (E710), HP Officejet 6600 All-in-One Printer Series, HP Officejet 6700 Premium All-in-One Printer Series, HP Officejet 6810 e-All-in-One Printer Series, HP Officejet 7500A Wide Format e-All-in-One Printer Series (E910), HP Officejet 7610 Wide Format e-All-in-One Printer Series (H912), HP Officejet 8040 e-All-in-One Printer Series, HP Officejet Pro 251dw Printer Series, HP Officejet Pro 276dw Multifunction Printer Series, HP Officejet Pro 6230 ePrinter Series, HP Officejet Pro 6830 e-All-in-One Printer Series, HP Officejet Pro 8100 ePrinter Series (N811), HP Officejet Pro 8500A e-All-in-One Printer Series (A910) , HP Officejet Pro 8600 e-All-in-One Printer Series (N911), HP Officejet Pro 8610 e-All-in-One Printer Series, HP Officejet Pro 8620 e-All-in-One Printer Series, HP Officejet Pro 8630 e-All-in-One Printer Series, HP Officejet Pro 8640 e-All-in-One Printer Series, HP Officejet Pro 8660 e-All-in-One Printer Series, HP Officejet Pro X451 All-in-One

Printer Series, HP Officejet Pro X476 Multifunction Printer Series, HP Officejet Pro X551 Printer Series, HP Officejet Pro X576 Multifunction Printer Series, HP Photosmart 5510 e-All-in-One Printer Series (B111), HP Photosmart 5520 e-All-in-One Printer Series, HP Photosmart 6510 e-All-in-One Printer (B211), HP Photosmart 6520 e-All-in-One Printer Series, HP Photosmart 7510 e-All-in-One Printer Series (C311), HP Photosmart 7520 e-All-in-One Printer Series, HP Photosmart e-All-in-One Printer Series (D110), HP Photosmart eStation e-All-in-One Printer Series (C510), HP Photosmart Ink Advantage e-All-in-One Printer Series (K510), HP Photosmart Plus e-All-in-One Printer Series (B210), HP Photosmart Premium e-All-in-One Printer Series (C310), HP Photosmart Premium Fax e-All-in-One Printer Series (C410), HP Photosmart Wireless e-All-in-One Printer Series (B110)) that directly infringed one or more claims of the 026 patent.

16. In addition, customers of HP used HP printers that feature Google Cloud Print or that are compatible with the feature designated “HP ePrint” (including, based on information on its website(s), at least the following models: HP Color LaserJet Enterprise CM4540 MFP Series, HP Color LaserJet Enterprise CP5525 Printer Series, HP LaserJet Enterprise M4555 MFP Series, HP HotSpot LaserJet Pro M1218nfs MFP Series, HP LaserJet Pro 100 Color MFP M175nw, HP LaserJet Pro 200 Color M251 Series, HP LaserJet Pro 200 Color M276 Series, HP LaserJet Pro 400 Color M401 Series, HP LaserJet Pro 400 Color M425 Series, HP LaserJet Pro 400 Color M451 Series, HP LaserJet Pro 400 Color M475 Series, HP LaserJet Pro CM1415 Color Multifunction Printer Series, HP LaserJet Pro CP1025nw Color Printer, HP LaserJet Pro CP1525 Color Printer Series, HP LaserJet Pro M177fw Multifunction Printer, HP LaserJet Pro M1210 Multifunction Printer Series, HP LaserJet Pro M1536 Multifunction Printer Series, HP LaserJet Pro MFP M125nw Printer, HP LaserJet Pro MFP M127fn Printer, HP LaserJet Pro MFP

M127fw Printer, HP LaserJet Pro MFP M201dw Printer, HP LaserJet Pro MFP M201n Printer, HP LaserJet Pro MFP M202dw Printer, HP LaserJet Pro MFP M202n Printer, HP LaserJet Pro MFP M225dw Printer, HP LaserJet Pro MFP M225dn Printer, HP LaserJet Pro MFP M226dw Printer, HP LaserJet Pro MFP M226dn Printer, HP LaserJet Pro P1102w Printer, HP LaserJet Pro P1606dn Printer, HP TopShot LaserJet Pro M275 MFP, HP Deskjet 3050A e-All-in-One Printer Series (J611), HP Deskjet 3070A e-All-in-One Printer Series (B611), HP Deskjet 3510 e-All-in-One Printer Series, HP Deskjet 3520 e-All-in-One Printer Series, HP Deskjet Ink Advantage 3515 e-All-in-One Printer Series, HP Deskjet Ink Advantage 3520 e-All-in-One Printer Series, HP Deskjet Ink Advantage 3540 e-All-in-One Printer Series, HP Deskjet Ink Advantage 4510 e-All-in-One Printer Series, HP Deskjet Ink Advantage 4620 e-All-in-One Printer Series, HP Deskjet Ink Advantage 4640 e-All-in-One Printer Series, HP Deskjet Ink Advantage 5520 e-All-in-One Printer Series, HP Deskjet Ink Advantage 6520 e-All-in-One, HP Designjet T120 24-in ePrinter, HP Designjet T520 24-in ePrinter, HP Designjet T520 36-in ePrinter, HP Designjet T790 24-in ePrinter, HP Designjet T790 24-in PostScript ePrinter, HP Designjet T790 44-in ePrinter, HP Designjet T790 44-in PostScript ePrinter, HP Designjet T1300 44-in ePrinter, HP Designjet T1300 44-in PostScript ePrinter, HP Designjet T2300 eMultifunction Printer, HP Designjet T2300 Postscript eMultifunction Printer, HP ENVY 100 e-All-in-One Printer Series (D410), HP ENVY 110 e-All-in-One Printer Series (D411), HP ENVY 120 e-All-in-One Printer Series, HP ENVY 4500 e-All-in-One Printer Series, HP ENVY 5530 e-All-in-One Printer Series, HP ENVY 5640 e-All-in-One Printer Series, HP ENVY 5660 e-All-in-One Printer Series, HP ENVY 7640 e-All-in-One Printer Series, HP Officejet 4620 e-All-in-One Printer Series, HP Officejet 4630 e-All-in-One Printer Series, HP Officejet 5740 e-All-in-One Printer Series, HP Officejet 6100 ePrinter Series (H611), HP Officejet 6500A e-All-in-One

Printer Series (E710), HP Officejet 6600 All-in-One Printer Series, HP Officejet 6700 Premium All-in-One Printer Series, HP Officejet 6810 e-All-in-One Printer Series, HP Officejet 7500A Wide Format e-All-in-One Printer Series (E910), HP Officejet 7610 Wide Format e-All-in-One Printer Series (H912), HP Officejet 8040 e-All-in-One Printer Series, HP Officejet Pro 251dw Printer Series, HP Officejet Pro 276dw Multifunction Printer Series, HP Officejet Pro 6230 ePrinter Series, HP Officejet Pro 6830 e-All-in-One Printer Series, HP Officejet Pro 8100 ePrinter Series (N811), HP Officejet Pro 8500A e-All-in-One Printer Series (A910) , HP Officejet Pro 8600 e-All-in-One Printer Series (N911), HP Officejet Pro 8610 e-All-in-One Printer Series, HP Officejet Pro 8620 e-All-in-One Printer Series, HP Officejet Pro 8630 e-All-in-One Printer Series, HP Officejet Pro 8640 e-All-in-One Printer Series, HP Officejet Pro 8660 e-All-in-One Printer Series, HP Officejet Pro X451 All-in-One Printer Series, HP Officejet Pro X476 Multifunction Printer Series, HP Officejet Pro X551 Printer Series, HP Officejet Pro X576 Multifunction Printer Series, HP Photosmart 5510 e-All-in-One Printer Series (B111), HP Photosmart 5520 e-All-in-One Printer Series, HP Photosmart 6510 e-All-in-One Printer (B211), HP Photosmart 6520 e-All-in-One Printer Series, HP Photosmart 7510 e-All-in-One Printer Series (C311), HP Photosmart 7520 e-All-in-One Printer Series, HP Photosmart e-All-in-One Printer Series (D110), HP Photosmart eStation e-All-in-One Printer Series (C510), HP Photosmart Ink Advantage e-All-in-One Printer Series (K510), HP Photosmart Plus e-All-in-One Printer Series (B210), HP Photosmart Premium e-All-in-One Printer Series (C310), HP Photosmart Premium Fax e-All-in-One Printer Series (C410), HP Photosmart Wireless e-All-in-One Printer Series (B110)), thus directly infringing one or more claims of the 026 patent.

17. HP induced the infringement of the abovementioned customers.

18. HP took active steps, directly and/or through contractual relationships with others, to cause infringement with both knowledge of the 026 patent and the specific intent to cause the abovementioned customers to use printers in a manner that infringed the 026 patent. Such steps by HP included, among other things, advising or directing the abovementioned customers to use printers in an infringing manner; advertising and promoting the use of printers in an infringing manner; and/or distributing instructions that guide users to use the printers in an infringing manner.

19. HP contributed to the infringement of the abovementioned customers.

20. The infringing printers used by the abovementioned customers have hardware and/or software components that are especially designed to be used with Google Cloud Print or “HP ePrint,” and are especially designed to be used in an infringing way. These components in these printers constitute a material part of the invention of one or more asserted claims of the 026 patent and are not staple articles of commerce suitable for substantial non-infringing use. These distinct and separate components are used only to carry out the Google Cloud Print functionality or “HP ePrint” in an infringing way and not any other printing functionality.

21. Dynamic Hosting has been damaged as a result of the infringing conduct by defendant alleged above. Thus, defendant is liable to Dynamic Hosting in an amount that adequately compensates Dynamic Hosting for such infringements, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

22. Dynamic Hosting and/or its predecessors-in-interest have satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law.

COUNT II: INFRINGEMENT OF U.S. PATENT NO. 6,216,156

23. On April 10, 2001, United States Patent No. 6,216,156 (“the 156 patent”) was duly and legally issued by the United States Patent and Trademark Office for an invention titled “Internet Message Communicator With Direct Output To A Hard Copy Device.”

24. Dynamic Hosting is the owner of the 156 patent with all substantive rights in and to that patent, including the sole and exclusive right to prosecute this action and enforce the 156 patent against infringers, and to collect damages for all relevant times.

25. HP made, had made, used, imported, provided, supplied, distributed, sold, and/or offered for sale printers that implemented Google Cloud Print (including, based on information on its or Google’s website(s), at least the following models: HP Color LaserJet Enterprise CM4540 MFP Series, HP Color LaserJet Enterprise CP5525 Printer Series, HP LaserJet Enterprise M4555 MFP Series, HP HotSpot LaserJet Pro M1218nfs MFP Series, HP LaserJet Pro 100 Color MFP M175nw, HP LaserJet Pro 200 Color M251 Series, HP LaserJet Pro 200 Color M276 Series, HP LaserJet Pro 400 Color M401 Series, HP LaserJet Pro 400 Color M425 Series, HP LaserJet Pro 400 Color M451 Series, HP LaserJet Pro 400 Color M475 Series, HP LaserJet Pro CM1415 Color Multifunction Printer Series, HP LaserJet Pro CP1025nw Color Printer, HP LaserJet Pro CP1525 Color Printer Series, HP LaserJet Pro M177fw Multifunction Printer, HP LaserJet Pro M1210 Multifunction Printer Series, HP LaserJet Pro M1536 Multifunction Printer Series, HP LaserJet Pro MFP M125nw Printer, HP LaserJet Pro MFP M127fn Printer, HP LaserJet Pro MFP M127fw Printer, HP LaserJet Pro MFP M201dw Printer, HP LaserJet Pro MFP M201n Printer, HP LaserJet Pro MFP M202dw Printer, HP LaserJet Pro MFP M202n Printer, HP LaserJet Pro MFP M225dw Printer, HP LaserJet Pro MFP M225dn Printer, HP LaserJet Pro MFP M226dw Printer, HP LaserJet Pro MFP M226dn Printer, HP LaserJet Pro P1102w Printer, HP LaserJet Pro P1606dn Printer, HP TopShot LaserJet Pro M275

MFP, HP Deskjet 3050A e-All-in-One Printer Series (J611), HP Deskjet 3070A e-All-in-One Printer Series (B611), HP Deskjet 3510 e-All-in-One Printer Series, HP Deskjet 3520 e-All-in-One Printer Series, HP Deskjet Ink Advantage 3515 e-All-in-One Printer Series, HP Deskjet Ink Advantage 3520 e-All-in-One Printer Series, HP Deskjet Ink Advantage 3540 e-All-in-One Printer Series, HP Deskjet Ink Advantage 4510 e-All-in-One Printer Series, HP Deskjet Ink Advantage 4620 e-All-in-One Printer Series, HP Deskjet Ink Advantage 4640 e-All-in-One Printer Series, HP Deskjet Ink Advantage 5520 e-All-in-One Printer Series, HP Deskjet Ink Advantage 6520 e-All-in-One, HP Designjet T120 24-in ePrinter, HP Designjet T520 24-in ePrinter, HP Designjet T520 36-in ePrinter, HP Designjet T790 24-in ePrinter, HP Designjet T790 24-in PostScript ePrinter, HP Designjet T790 44-in ePrinter, HP Designjet T790 44-in PostScript ePrinter, HP Designjet T1300 44-in ePrinter, HP Designjet T1300 44-in PostScript ePrinter, HP Designjet T2300 eMultifunction Printer, HP Designjet T2300 Postscript eMultifunction Printer, HP ENVY 100 e-All-in-One Printer Series (D410), HP ENVY 110 e-All-in-One Printer Series (D411), HP ENVY 120 e-All-in-One Printer Series, HP ENVY 4500 e-All-in-One Printer Series, HP ENVY 5530 e-All-in-One Printer Series, HP ENVY 5640 e-All-in-One Printer Series, HP ENVY 5660 e-All-in-One Printer Series, HP ENVY 7640 e-All-in-One Printer Series, HP Officejet 4620 e-All-in-One Printer Series, HP Officejet 4630 e-All-in-One Printer Series, HP Officejet 5740 e-All-in-One Printer Series, HP Officejet 6100 ePrinter Series (H611), HP Officejet 6500A e-All-in-One Printer Series (E710), HP Officejet 6600 All-in-One Printer Series, HP Officejet 6700 Premium All-in-One Printer Series, HP Officejet 6810 e-All-in-One Printer Series, HP Officejet 7500A Wide Format e-All-in-One Printer Series (E910), HP Officejet 7610 Wide Format e-All-in-One Printer Series (H912), HP Officejet 8040 e-All-in-One Printer Series, HP Officejet Pro 251dw Printer Series, HP Officejet Pro 276dw Multifunction

Printer Series, HP Officejet Pro 6230 ePrinter Series, HP Officejet Pro 6830 e-All-in-One Printer Series, HP Officejet Pro 8100 ePrinter Series (N811), HP Officejet Pro 8500A e-All-in-One Printer Series (A910) , HP Officejet Pro 8600 e-All-in-One Printer Series (N911), HP Officejet Pro 8610 e-All-in-One Printer Series, HP Officejet Pro 8620 e-All-in-One Printer Series, HP Officejet Pro 8630 e-All-in-One Printer Series, HP Officejet Pro 8640 e-All-in-One Printer Series, HP Officejet Pro 8660 e-All-in-One Printer Series, HP Officejet Pro X451 All-in-One Printer Series, HP Officejet Pro X476 Multifunction Printer Series, HP Officejet Pro X551 Printer Series, HP Officejet Pro X576 Multifunction Printer Series, HP Photosmart 5510 e-All-in-One Printer Series (B111), HP Photosmart 5520 e-All-in-One Printer Series, HP Photosmart 6510 e-All-in-One Printer (B211), HP Photosmart 6520 e-All-in-One Printer Series, HP Photosmart 7510 e-All-in-One Printer Series (C311), HP Photosmart 7520 e-All-in-One Printer Series, HP Photosmart e-All-in-One Printer Series (D110), HP Photosmart eStation e-All-in-One Printer Series (C510), HP Photosmart Ink Advantage e-All-in-One Printer Series (K510), HP Photosmart Plus e-All-in-One Printer Series (B210), HP Photosmart Premium e-All-in-One Printer Series (C310), HP Photosmart Premium Fax e-All-in-One Printer Series (C410), HP Photosmart Wireless e-All-in-One Printer Series (B110)) that infringed one or more claims of the 156 patent.

26. HP made, had made, used, imported, provided, supplied, distributed, sold, and/or offered for sale printers that are compatible with the feature designated “HP ePrint” (including, based on information on its website(s), at least the following models: HP Color LaserJet Enterprise CM4540 MFP Series, HP Color LaserJet Enterprise CP5525 Printer Series, HP LaserJet Enterprise M4555 MFP Series, HP HotSpot LaserJet Pro M1218nfs MFP Series, HP LaserJet Pro 100 Color MFP M175nw, HP LaserJet Pro 200 Color M251 Series, HP LaserJet Pro

200 Color M276 Series, HP LaserJet Pro 400 Color M401 Series, HP LaserJet Pro 400 Color M425 Series, HP LaserJet Pro 400 Color M451 Series, HP LaserJet Pro 400 Color M475 Series, HP LaserJet Pro CM1415 Color Multifunction Printer Series, HP LaserJet Pro CP1025nw Color Printer, HP LaserJet Pro CP1525 Color Printer Series, HP LaserJet Pro M177fw Multifunction Printer, HP LaserJet Pro M1210 Multifunction Printer Series, HP LaserJet Pro M1536 Multifunction Printer Series, HP LaserJet Pro MFP M125nw Printer, HP LaserJet Pro MFP M127fn Printer, HP LaserJet Pro MFP M127fw Printer, HP LaserJet Pro MFP M201dw Printer, HP LaserJet Pro MFP M201n Printer, HP LaserJet Pro MFP M202dw Printer, HP LaserJet Pro MFP M202n Printer, HP LaserJet Pro MFP M225dw Printer, HP LaserJet Pro MFP M225dn Printer, HP LaserJet Pro MFP M226dw Printer, HP LaserJet Pro MFP M226dn Printer, HP LaserJet Pro P1102w Printer, HP LaserJet Pro P1606dn Printer, HP TopShot LaserJet Pro M275 MFP, HP Deskjet 3050A e-All-in-One Printer Series (J611), HP Deskjet 3070A e-All-in-One Printer Series (B611), HP Deskjet 3510 e-All-in-One Printer Series, HP Deskjet 3520 e-All-in-One Printer Series, HP Deskjet Ink Advantage 3515 e-All-in-One Printer Series, HP Deskjet Ink Advantage 3520 e-All-in-One Printer Series, HP Deskjet Ink Advantage 3540 e-All-in-One Printer Series, HP Deskjet Ink Advantage 4510 e-All-in-One Printer Series, HP Deskjet Ink Advantage 4620 e-All-in-One Printer Series, HP Deskjet Ink Advantage 4640 e-All-in-One Printer Series, HP Deskjet Ink Advantage 5520 e-All-in-One Printer Series, HP Deskjet Ink Advantage 6520 e-All-in-One, HP Designjet T120 24-in ePrinter, HP Designjet T520 24-in ePrinter, HP Designjet T520 36-in ePrinter, HP Designjet T790 24-in ePrinter, HP Designjet T790 24-in PostScript ePrinter, HP Designjet T790 44-in ePrinter, HP Designjet T790 44-in PostScript ePrinter, HP Designjet T1300 44-in ePrinter, HP Designjet T1300 44-in PostScript ePrinter, HP Designjet T2300 eMultifunction Printer, HP Designjet T2300 Postscript

eMultifunction Printer, HP ENVY 100 e-All-in-One Printer Series (D410), HP ENVY 110 e-All-in-One Printer Series (D411), HP ENVY 120 e-All-in-One Printer Series, HP ENVY 4500 e-All-in-One Printer Series, HP ENVY 5530 e-All-in-One Printer Series, HP ENVY 5640 e-All-in-One Printer Series, HP ENVY 5660 e-All-in-One Printer Series, HP ENVY 7640 e-All-in-One Printer Series, HP Officejet 4620 e-All-in-One Printer Series, HP Officejet 4630 e-All-in-One Printer Series, HP Officejet 5740 e-All-in-One Printer Series, HP Officejet 6100 ePrinter Series (H611), HP Officejet 6500A e-All-in-One Printer Series (E710), HP Officejet 6600 All-in-One Printer Series, HP Officejet 6700 Premium All-in-One Printer Series, HP Officejet 6810 e-All-in-One Printer Series, HP Officejet 7500A Wide Format e-All-in-One Printer Series (E910), HP Officejet 7610 Wide Format e-All-in-One Printer Series (H912), HP Officejet 8040 e-All-in-One Printer Series, HP Officejet Pro 251dw Printer Series, HP Officejet Pro 276dw Multifunction Printer Series, HP Officejet Pro 6230 ePrinter Series, HP Officejet Pro 6830 e-All-in-One Printer Series, HP Officejet Pro 8100 ePrinter Series (N811), HP Officejet Pro 8500A e-All-in-One Printer Series (A910) , HP Officejet Pro 8600 e-All-in-One Printer Series (N911), HP Officejet Pro 8610 e-All-in-One Printer Series, HP Officejet Pro 8620 e-All-in-One Printer Series, HP Officejet Pro 8630 e-All-in-One Printer Series, HP Officejet Pro 8640 e-All-in-One Printer Series, HP Officejet Pro 8660 e-All-in-One Printer Series, HP Officejet Pro X451 All-in-One Printer Series, HP Officejet Pro X476 Multifunction Printer Series, HP Officejet Pro X551 Printer Series, HP Officejet Pro X576 Multifunction Printer Series, HP Photosmart 5510 e-All-in-One Printer Series (B111), HP Photosmart 5520 e-All-in-One Printer Series, HP Photosmart 6510 e-All-in-One Printer (B211), HP Photosmart 6520 e-All-in-One Printer Series, HP Photosmart 7510 e-All-in-One Printer Series (C311), HP Photosmart 7520 e-All-in-One Printer Series, HP Photosmart e-All-in-One Printer Series (D110), HP Photosmart eStation e-All-in-One

Printer Series (C510), HP Photosmart Ink Advantage e-All-in-One Printer Series (K510), HP Photosmart Plus e-All-in-One Printer Series (B210), HP Photosmart Premium e-All-in-One Printer Series (C310), HP Photosmart Premium Fax e-All-in-One Printer Series (C410), HP Photosmart Wireless e-All-in-One Printer Series (B110)) that infringed one or more claims of the 156 patent.

27. In addition, customers of HP used HP printers that feature Google Cloud Print or that are compatible with the feature designated “HP ePrint” (including, based on information on its website(s), at least the following models: HP Color LaserJet Enterprise CM4540 MFP Series, HP Color LaserJet Enterprise CP5525 Printer Series, HP LaserJet Enterprise M4555 MFP Series, HP HotSpot LaserJet Pro M1218nfs MFP Series, HP LaserJet Pro 100 Color MFP M175nw, HP LaserJet Pro 200 Color M251 Series, HP LaserJet Pro 200 Color M276 Series, HP LaserJet Pro 400 Color M401 Series, HP LaserJet Pro 400 Color M425 Series, HP LaserJet Pro 400 Color M451 Series, HP LaserJet Pro 400 Color M475 Series, HP LaserJet Pro CM1415 Color Multifunction Printer Series, HP LaserJet Pro CP1025nw Color Printer, HP LaserJet Pro CP1525 Color Printer Series, HP LaserJet Pro M177fw Multifunction Printer, HP LaserJet Pro M1210 Multifunction Printer Series, HP LaserJet Pro M1536 Multifunction Printer Series, HP LaserJet Pro MFP M125nw Printer, HP LaserJet Pro MFP M127fn Printer, HP LaserJet Pro MFP M127fw Printer, HP LaserJet Pro MFP M201dw Printer, HP LaserJet Pro MFP M201n Printer, HP LaserJet Pro MFP M202dw Printer, HP LaserJet Pro MFP M202n Printer, HP LaserJet Pro MFP M225dw Printer, HP LaserJet Pro MFP M225dn Printer, HP LaserJet Pro MFP M226dw Printer, HP LaserJet Pro MFP M226dn Printer, HP LaserJet Pro P1102w Printer, HP LaserJet Pro P1606dn Printer, HP TopShot LaserJet Pro M275 MFP, HP Deskjet 3050A e-All-in-One Printer Series (J611), HP Deskjet 3070A e-All-in-One Printer Series (B611), HP Deskjet 3510 e-

All-in-One Printer Series, HP Deskjet 3520 e-All-in-One Printer Series, HP Deskjet Ink Advantage 3515 e-All-in-One Printer Series, HP Deskjet Ink Advantage 3520 e-All-in-One Printer Series, HP Deskjet Ink Advantage 3540 e-All-in-One Printer Series, HP Deskjet Ink Advantage 4510 e-All-in-One Printer Series, HP Deskjet Ink Advantage 4620 e-All-in-One Printer Series, HP Deskjet Ink Advantage 4640 e-All-in-One Printer Series, HP Deskjet Ink Advantage 5520 e-All-in-One Printer Series, HP Deskjet Ink Advantage 6520 e-All-in-One, HP Designjet T120 24-in ePrinter, HP Designjet T520 24-in ePrinter, HP Designjet T520 36-in ePrinter, HP Designjet T790 24-in ePrinter, HP Designjet T790 24-in PostScript ePrinter, HP Designjet T790 44-in ePrinter, HP Designjet T790 44-in PostScript ePrinter, HP Designjet T1300 44-in ePrinter, HP Designjet T1300 44-in PostScript ePrinter, HP Designjet T2300 eMultifunction Printer, HP Designjet T2300 Postscript eMultifunction Printer, HP ENVY 100 e-All-in-One Printer Series (D410), HP ENVY 110 e-All-in-One Printer Series (D411), HP ENVY 120 e-All-in-One Printer Series, HP ENVY 4500 e-All-in-One Printer Series, HP ENVY 5530 e-All-in-One Printer Series, HP ENVY 5640 e-All-in-One Printer Series, HP ENVY 5660 e-All-in-One Printer Series, HP ENVY 7640 e-All-in-One Printer Series, HP Officejet 4620 e-All-in-One Printer Series, HP Officejet 4630 e-All-in-One Printer Series, HP Officejet 5740 e-All-in-One Printer Series, HP Officejet 6100 ePrinter Series (H611), HP Officejet 6500A e-All-in-One Printer Series (E710), HP Officejet 6600 All-in-One Printer Series, HP Officejet 6700 Premium All-in-One Printer Series, HP Officejet 6810 e-All-in-One Printer Series, HP Officejet 7500A Wide Format e-All-in-One Printer Series (E910), HP Officejet 7610 Wide Format e-All-in-One Printer Series (H912), HP Officejet 8040 e-All-in-One Printer Series, HP Officejet Pro 251dw Printer Series, HP Officejet Pro 276dw Multifunction Printer Series, HP Officejet Pro 6230 ePrinter Series, HP Officejet Pro 6830 e-All-in-One Printer Series, HP Officejet Pro 8100

ePrinter Series (N811), HP Officejet Pro 8500A e-All-in-One Printer Series (A910) , HP Officejet Pro 8600 e-All-in-One Printer Series (N911), HP Officejet Pro 8610 e-All-in-One Printer Series, HP Officejet Pro 8620 e-All-in-One Printer Series, HP Officejet Pro 8630 e-All-in-One Printer Series, HP Officejet Pro 8640 e-All-in-One Printer Series, HP Officejet Pro 8660 e-All-in-One Printer Series, HP Officejet Pro X451 All-in-One Printer Series, HP Officejet Pro X476 Multifunction Printer Series, HP Officejet Pro X551 Printer Series, HP Officejet Pro X576 Multifunction Printer Series, HP Photosmart 5510 e-All-in-One Printer Series (B111), HP Photosmart 5520 e-All-in-One Printer Series, HP Photosmart 6510 e-All-in-One Printer (B211), HP Photosmart 6520 e-All-in-One Printer Series, HP Photosmart 7510 e-All-in-One Printer Series (C311), HP Photosmart 7520 e-All-in-One Printer Series, HP Photosmart e-All-in-One Printer Series (D110), HP Photosmart eStation e-All-in-One Printer Series (C510), HP Photosmart Ink Advantage e-All-in-One Printer Series (K510), HP Photosmart Plus e-All-in-One Printer Series (B210), HP Photosmart Premium e-All-in-One Printer Series (C310), HP Photosmart Premium Fax e-All-in-One Printer Series (C410), HP Photosmart Wireless e-All-in-One Printer Series (B110)), thus directly infringing one or more claims of the 156 patent.

28. HP induced the infringement of the abovementioned customers.

29. HP took active steps, directly and/or through contractual relationships with others, to cause infringement with both knowledge of the 156 patent and the specific intent to cause the abovementioned customers to use printers in a manner that infringed the 156 patent. Such steps by HP included, among other things, advising or directing the abovementioned customers to use printers in an infringing manner; advertising and promoting the use of printers in an infringing manner; and/or distributing instructions that guide users to use the printers in an infringing manner.

30. HP contributed to the infringement of the abovementioned customers.

31. The infringing printers used by the abovementioned customers have hardware and/or software components that are especially designed to be used with Google Cloud Print or “HP ePrint,” and are especially designed to be used in an infringing way. These components in these printers constitute a material part of the invention of one or more asserted claims of the 156 patent and are not staple articles of commerce suitable for substantial non-infringing use. These distinct and separate components are used only to carry out the Google Cloud Print functionality or “HP ePrint” in an infringing way and not any other printing functionality.

32. Dynamic Hosting has been damaged as a result of the infringing conduct by defendant alleged above. Thus, defendant is liable to Dynamic Hosting in an amount that adequately compensates Dynamic Hosting for such infringements, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

33. Dynamic Hosting and/or its predecessors-in-interest have satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law.

JURY DEMAND

Dynamic Hosting hereby requests a trial by jury on all issues so triable by right.

PRAYER FOR RELIEF

Dynamic Hosting requests that the Court find in its favor and against defendants and that the Court grant Dynamic Hosting the following relief:

a. Judgment that one or more claims of the 026 and 156 patents have been infringed, either literally and/or under the doctrine of equivalents, by defendants;

b. Judgment that defendants account for and pay to Dynamic Hosting all damages to and costs incurred by Dynamic Hosting because of defendants' infringing activities and other conduct complained of herein;

c. That defendant's infringement be found to be willful, and that the Court award treble damages for the period of such willful infringement under 35 U.S.C. § 284;

d. A permanent injunction enjoining defendants and their respective officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert therewith from infringement of the 026 and 156 patents;

e. Pre-judgment and post-judgment interest on the damages caused by defendants' infringing activities and other conduct complained of herein;

f. A declaration by the Court that this an exceptional case and an award to Dynamic Hosting its reasonable attorneys' fees and costs in accordance with 35 U.S.C. § 285; and

g. Other and further relief as the Court may deem just and proper under the circumstances.

Dated: November 24, 2014

Respectfully submitted,

/s/ Matthew J. Antonelli

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